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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-10-089

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(18 U.S.C. § 2252(a)(1))

OZGUR EVREN,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS.:

Todd Hyman, being duly sworn, deposes and says that he is a Special Agent with United States Department of Homeland Security, Immigration and Customs Enforcement ("ICE"), duly appointed according to law and acting as such.

Upon information and belief, on or about January 26, 2010, within the Eastern District of New York and elsewhere, the defendant OZGUR EVREN did knowingly and intentionally transport or ship in interstate and foreign commerce, by means including by computer, visual depictions involving the use of one or more minors engaging in sexually explicit conduct and such visual depiction of was of such conduct.

(Title 18, United States Code, Section 2252(a)(1)).

The source of my information and the grounds for my belief are as follows:¹

1. I have been employed as a Special Agent of ICE since June 2009. I am currently assigned to John F. Kennedy International Airport ("JFK Airport"). As such, I am authorized to conduct investigations relating to, among other things, crimes against children, including the trafficking of child pornography.

2. I am familiar with the information contained in this affidavit based on my own personal participation in the investigation, my review of documents, my training and experience, and discussions I have had with other law enforcement personnel. Additionally, statements attributable to individuals herein are set forth in sum and substance and in part.

THE INVESTIGATION

3. In or about December 2008, based on information provided by the German Federal Police, Child Porn Unit, the Newark, New Jersey office of ICE identified the defendant OZGUR EVREN as possibly having accessed digital files containing child pornography over the Internet via the eDonkey2000 file sharing software program.

4. On or about January 26, 2010, the defendant arrived at JFK Airport International Arrivals Terminal 1 on Turkish Airways flight TK1 from Attaturk International Airport in

¹ Because the purpose of this complaint is merely to establish probable cause to arrest, I have not set forth all of the facts and circumstances concerning this investigation of which I am aware.


Istanbul, Turkey. Upon arrival, U.S. Customs and Border Protection ("CBP") officers referred the defendant for a Customs examination. During the Customs examination, CBP officers and ICE agents searched the defendant's luggage and recovered a laptop computer, an external hard drive, a Nokia cell phone and an iPhone.

5. An ICE computer forensics agent conducted a forensic search of the files contained on the laptop computer and the external hard drive. In the course of searching the hard drive, the ICE computer forensics agent discovered several videos depicting child pornography. Examples of these videos, which are available for the Court's review, include the following:

a. **Vicky Good Daughter - Tbc Part 1 - Preteen 7Yo Childlover - Beginning.mpg**: This video depicts a prepubescent girl performing fellatio on an adult male. The video is approximately 14 minutes and 48 seconds long.

b. **Babyshibid 4y.mpg:** This video depicts an adult male having intercourse with a prepubescent girl. This video is approximately one minute and 5 seconds long.

WHEREFORE, your deponent respectfully requests that defendant OZGUR EVREN be dealt with according to law.



TODD HYMAN
Senior Special Agent
Immigration and Customs
Enforcement

Sworn to before me this
27th day of January, 2010

JGE